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**From:** Palomares, Art [Palomares.Art@epa.gov]  
**Sent:** 6/19/2018 6:07:56 PM  
**To:** Benevento, Douglas [benevento.douglas@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]; Bohan, Suzanne [bohan.suzanne@epa.gov]  
**Subject:** Sanitary Survey Follow-up  
**Attachments:** sanitary\_survey\_significant\_deficiency\_training\_presentation.pdf

Doug and Deb,

Thought you might be interested in the attached sanitary survey powerpoint. As I mentioned Sanitary Surveys are done by Darcy's group, so hopefully I wasn't talking out of turn.

And I've checked with my staff and here's what I got back: . Significant deficiencies are not violations. If the PWS incurs a violation for failure to correct a significant violation then that becomes the violation. Typically, we'll have an enforceable violation that we tie into the significant deficiency, which we wrap all up in an Administrative Order.

To clarify, the Public Water System has a set amount of time, 6-months, unless the time frame is extended by EPA, to address a significant deficiency. The violation occurs when they fail to correct the significant deficiency within the time frame(s) established by EPA.

All of the pre-work, sanitary survey, violation letters, etc., is done by Darcy's group and they refer the matter to enforcement when they believe it is appropriate to do so.

Art Palomares, Director  
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Office of Enforcement, Compliance  
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United States Environmental Protection Agency